

**Dated: 20/10/17**

**IN THE MATTER OF:**

**THE PUBLIC INQUIRY INTO UNDERCOVER POLICING  
SUBMITTED ON BEHALF OF  
The College of Policing**

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**WITNESS STATEMENT OF Louise Meade**

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I, Louise Meade of The College of Policing will say:

I am Head of Selection and Assessment for the College of Policing and I lead and manage the Selection and Assessment department, the remit of which is to design and deliver a range of national policing selection and assessment products including examinations and assessment centres for recruitment, selection, development and promotion purposes. I provide this statement in that capacity.

On the 20<sup>th</sup> January 2017 I made a Statement in response to a Rule 9(5) request issued by the Undercover Policing Inquiry on the 1<sup>st</sup> December 2016. That statement ran to 135 paragraphs and is reproduced below from paragraphs 1 to 135. On the 30<sup>th</sup> June 2017 I was asked to respond to a further, Rule 9(5A), request for information and clarification. The answers to that request appear in this statement from paragraph 136 to 230. On 25<sup>th</sup> September 2017 I was asked to respond to a

further, Rule 9(5B), request. The answers to that request appear from paragraph 231 onwards.

I, Louise Meade of The College of Policing will say:

1. I am the Head of Selection and Assessment for the College of Policing.
2. This statement is provided in response to a Rule 9 of the Inquiry Rules request dated 1st December 2016, under the Inquiries Act 2005. It details the responses to the questions set out in the request regarding the College of Policing

**My Role**

3. I lead and manage the Selection and Assessment department, the remit of which is to design and deliver a range of national policing selection and assessment products including examinations and assessment centres for recruitment, selection, development and promotion purposes.
4. I am a Chartered Psychologist and Associate Fellow of the British Psychological Society (BPS) and also a Registered Practitioner Psychologist (Occupational) with the Health and Care Professions Council (HCPC).
5. I have a BSc (Hons) in Psychology, an MSc in Occupational Psychology. Occupational psychologists specialise in the application of psychological and behavioural understanding to people in work contexts.

6. Since joining the College of Policing and its predecessor the National Policing Improvement Agency (NPIA) in 2007, I have specialised in selection and assessment as described above. Prior to joining the NPIA I worked for the Home Office and the Defence Evaluation and Research Agency (DERA, latterly QinetiQ).
  
7. I have been involved in working in the undercover policing field since 2011 when (then as a Senior Psychologist) I was involved in the initial review of the selection, training and support of undercover officers. As Senior Psychologist I was responsible for the day to day management and supervision of the review team but I was not responsible for the overall strategic direction of the project. However, I am the most senior person involved at the time who is still employed by the College of Policing, and I was fully involved with the day to day business of the review and therefore am qualified to make this statement.
  
8. Documents referred to and supplied are exhibited in bold text with the corresponding exhibit number.

**Response to the Rule 9(5) letter dated 1<sup>st</sup> December 2016**

9. In order to ensure that the statement provides a narrative I have sought to answer the questions during the narrative rather than in the order as they appear in the Rule 9(5) request. In order to assist the reader the statement is broken down into sections.

**The College's current and past role in relation to Recruitment, Selection, Psychological Assessment and Support and Welfare.**

10. The Head of the National Undercover Working Group (DAC Patricia Gallan) wrote to the Chief Executive of the NPIA in 2011 requesting the NPIA's assistance in a review of selection and support of undercover officers. I now produce this document as **Exhibit LM/01 - Letter: 0711 Nick Gargan**).

11. In response to the letter a project team was set up to conduct a review and make recommendations. To the best of my knowledge there had been no involvement of the NPIA or its predecessor organisations in the selection, assessment or support of undercover officers before that time. The NPIA and predecessor organisation had been involved in the provision of training but that is the subject of a separate statement authored by Gary McFadden of the College of Policing and submitted to the Inquiry on 3<sup>rd</sup> February 2017.

12. I describe below the work the College has undertaken initially on the 2012 review of the selection, training and support of undercover officers, and subsequently on the delivery of selection and 'support' products for forces and units recruiting and employing undercover officers.

**The methods used by NPIA to research and make recommendations about recruitment, selection, psychological assessment and support and welfare in 2012.**

13. The methodology used for the review is comprehensively explained at section 2 of the NPIA report – Review of the selection, training and support of undercover officers – findings and recommendations (2012) and more detail is given in Appendix A of the same report. This document is not supplied to the Inquiry as it is clear that the Inquiry already has a copy of the same.
14. I am unable to supply any further detail on how the research was conducted, over and above the detailed information already seen by the Inquiry team. The Inquiry team has already been provided with the raw data gathered as a result of the interviews and focus groups (this data was delivered by hand on 6<sup>th</sup> May 2016 in response to the Section 21 notice from the Inquiry dated 18<sup>th</sup> April 2016).
15. The methodology and approach was approved by the Home Office Projects Board which assesses the quality of research proposals against the Government Science Standard. The application form is supplied as additional information about how the project was designed to meet the aims. This is produced as **Exhibit LM/02 - PQRB UC Final v3**.
16. The recommendations were made by the project team as a whole, including me and **PN0003** who no longer works for the College. **PN0003** was a more senior manager employed at the time, based upon the evidence gathered and our professional knowledge relating to the subject matter. This

was done by means of a structured team workshop where all the evidence and recommendations were considered and agreed

17. Initial draft recommendations were presented to DAC Gallan at a presentation in June/July 2012 (the exact date of this is not known) and the final report produced in August 2012. The Recommendations Presentation is supplied as **Exhibit LM/03**.

**The “person specification” referred to a paragraph 2.2 of the NPIA 2012 report.**

18. The document ‘Person Specification for UCs’ is supplied. I produce this document as **Exhibit LM/04**.

**Implementation of the review recommendations and HMIC Action Plan**

19. After the publication of the review in August 2012 there was a hiatus whereby no further work was done by the College on the selection and support of undercover officers. I was absent from work between March 2013 and February 2014 however on my return to work I was asked to be involved in the undercover work again, this time to assist in a programme of work to implement the recommendations of the review.

20. A series of work streams was devised with ‘Support’ being one, to cover the recommendations relating to psychological assessment and mental wellbeing support, and ‘selection’ being another, separate work stream. The work streams were simply packages of work related to a category of issues

emanating from the review. For each work stream there was a lead, who managed the work on each stream, and reported progress in to regular internal team meetings and Programme meetings with the Head of NUWG (see Para k25). **[see correction to this paragraph at paragraph 138]**

21. There were also work streams relating to 'APP', 'Training', 'National (Strategy and Workforce Planning)' and 'Accreditation'.

22. I was allocated to lead on the 'support' work stream for the College and to mentor a colleague leading on the 'selection' package alongside the relevant work stream leads for NUWG.

23. The work packages were agreed with the new Head of the NUWG, Commander Richard Martin and managed via regular programme meetings between the NUWG and the College. The meetings were held face to face on occasion but more often as telephone conferences where by work stream leads from the College and the Service would update on progress.

24. Throughout 2014 my colleague and I undertook work according to the project plan, however the project did encounter some delays due to the imminent HMIC report on undercover policing – it seemed prudent to await the outcome of that review in case HMIC recommendations then superseded those of the 2012 review.

25. In the event the HMIC report was released in October 2014 and was largely supportive of the recommendations in the 2012 NPIA report.

### **HMIC ACTION PLAN**

26. A new action plan was developed which had 49 actions based on the HMIC recommendations.

27. In November 2014 I undertook the Head of Selection and Assessment role on a temporary basis, which became permanent in June 2015.

28. The Selection and Support Work streams were now focussed around the HMIC action plan although in practice the work was a continuation of that which had already been started (as the HMIC report was largely in agreement with the NPIA recommendations on these matters). The teams continued the work to deliver the Action Plan however this was now in the context of reduced resourcing within the College having lost a number of key project personnel due to restructuring.

29. For each work stream there was a lead from within the Police Service appointed by the head of the NUWG, and where appropriate a College of Policing lead who was responsible for managing the work of College staff, under the direction of David Tucker as Faculty Lead for Crime and Criminal Justice. The work stream leads (both Service and College) would report progress to a monthly meeting chaired by the head of NUWG.

## **SELECTION**

### **30. Specific Actions in the Action Plan relating to Selection were as follows:**

31. *The College of Policing should ensure that psychological assessment is an element in the selection process for those who seek to become undercover officers. It should be undertaken before attending the Foundation Undercover Training and Assessment Course. AMENDED\* The College of Policing should ensure that there is appropriate selection assessments of suitability to become a Foundation Undercover Officer. This should ensure that it contains relevant aspects of psychological suitability for this role.*

32. The amendment to this action was made by the College in agreement with the chair of NUWG. The HMIC report referred to 'psychological assessment' but it is clear from the narrative in the report that this refers to what is now called 'Personality Assessment' i.e. "helping to identify those police officers whose personal characteristics are suitable for this sensitive type of police work" (HMIC 2014). In the HMIC report the terms 'psychological' and 'psychometric' were used interchangeably but the narrative shows that the HMIC agreed with the principle of assessing for suitability of the individual for undertaking undercover work, at the outset of their UC career, before UCF training.

33. For the purposes of this statement 'Selection' refers to all work undertaken which relates to the assessment for selection purposes, of UCs for UCF and UCA roles, and UC Online although this is addressed later in the statement. The process of employing and deploying UCs once selected is a matter for

units and forces and the College is not involved in that other than in the provision or running of a selection process to identify which candidates should be recruited or selected.

34. Specifically, the work undertaken since February 2014 is detailed in the following paragraphs.

35. Following the accepted recommendation (the 2012 report) to design and develop a national selection process for foundation (UCF) and advanced (UCA) officers, work began on this in February 2014. Initially a proposal report was produced to outline the recommendations in more detail. This is produced as **Exhibit LM/42**. This was drawn up in conjunction with members of the NUWG and a meeting was held in March 2014 with the NUWG Selection lead at the time (PN0005 – Metropolitan Police Service). The proposals were agreed at this meeting and following this, design work began.

36. All units were contacted via the NUWG and COM-UCs (Covert Operations Manager – Undercover) to inform them that a national selection process for UCF and UCA was being designed and invited participation from all units. The design team spoke to and visited all units who wanted to be involved within the design. This included speaking to COM-UCs, cover officers and current operatives to collect specific ideas for exercise content and to find out exactly what would and wouldn't be needed within the process to ensure it met the needs of units whilst still being a robust and standardised selection process.

37. From these initial meetings, a number of documents were created to standardise each of the stages of the selection process. This is detailed in paragraphs 44-96. Through further meetings with units and consultation events with undercover operatives and managers, these documents were refined and discussed in greater detail to ensure that they included what was needed, were realistic and were eliciting what was needed from those applying for the role, without compromising the roles by giving away tactics or putting any current operatives in any danger. **[see correction to this paragraph at paragraph 140]**

38. After several consultation events to refine and amend these documents, a pilot event was also held at a neutral location. This involved a number of current operatives for both UCF and UCA attending and acting as 'mock candidates' for the day to test the exercises to ensure that they were realistic and fair to be used for assessment. The exercises were further refined after this event and guidance for the assessors was drawn up based on the what behaviours candidates who showed potential for the role should be showing and what considerations good candidates should be making. A large number of units, COM-UCs, cover officers and operatives were involved in the design of selection processes.

39. The UCF process and associated documents designed during this design process for each stage are detailed below. Prior to finalising all exercises, they all received a legal and diversity check by the College of Policing's Legal

Services Team. Both processes were rolled out from November 2014 in a slow and phased roll out under the scrutiny of the College of Policing to ensure that all aspects of the process worked as expected. This process, along with the associated documents produced for each stage, is detailed below for each process.

40. The UCF process is unit-led with the College of Policing providing guidance, assessor training, quality assurance and feedback to enable units to comply with the national standards set. When wishing to run a selection process, units contact the College to discuss requirements, dates, expected candidate numbers and the process in more detail. Units are then sent the Unit overview document detailing all stages of the process.

41. A selection process is initiated by the force or regional unit which requires additional staff. The College does not co-ordinate the initiation or requirement for selection processes.

## **UCF PROCESS**

### **A. Advertising**

42. A guidance document 'UCF Advertising and Open Day Requirements' for units to use when advertising the role has been produced. This part of the process is run by units themselves and the guidance document details best practice and considerations for units. I produce this document as **Exhibit LM/05**.

43. The College guidance is that UCF posts should be advertised widely via normal force routes. Since only police officers are currently eligible this will be internal force advertising.

44. Some forces/units also choose to attempt to conduct searches for potential UCs by asking line managers to identify those who may have skills to become effective UCs and encourage them to apply via the normal route. This is not part of the College's process however if forces do decide to attempt to recruit via word of mouth there is guidance in the above document (produced as **Exhibit LM/05**) as to how to do this more effectively. All candidates are still required to apply through the standard process.

### **B. Open Day**

45. A guidance document on conducting the open day for units is combined with the job advertising document. Units are required to hold an open day for prospective candidates to provide more detail on the role and answer questions. The guidance details considerations for this stage and what to include, without compromising tactics.

46. Those wishing to apply after the open day are provided with a UCF 'Realistic Job Preview' document. This document was created in conjunction with those in the role to detail the realities for the role, potential impact on current job and career path, family and social life, and personal wellbeing as well as detailing positive aspects of the role. A self-selection tool has also been created by the College as part of this document for prospective candidates to work through so they can decide if the role is right for them or not. Candidates are not

required to hand this self-selection tool into the unit but are encouraged to reflect upon it and discuss any concerns with a member of the unit to ensure the role is right for them. This document is provided as **Exhibit LM/06**.

47. No sifting takes place at this stage and candidates can submit an application form if they wish. Some forces are concerned that this can result in an inordinately high number of application forms which are resource intensive to sift, so there has been some consideration of an additional sift process, but this has not yet been agreed or designed.

### **C. Application form**

48. A national application form has been produced and is required to be completed by all applicants. Upon completion, application sifting is completed by units. The application form is produced as **Exhibit LM/07**.

49. Comprehensive guidance on how to sift application forms has been produced and is sent to all units to follow for this stage. This document is produced as **Exhibit LM/08 – ‘UCF Application Form Sifting Requirements’**. Units are also sent a ‘UCF Application Form Classification and Evaluation Document’ to complete during the sift for each candidate and a ‘UCF Developmental Record’ to detail feedback from the application forms to be discussed with candidates. These forms are produced as **Exhibit LM/09** and **Exhibit LM/10** respectively. For those successful, this developmental record can be carried forward and utilised at the training stage (it is not used as part of the decision making process at the assessment process). The developmental record should provide constructive feedback for those not successful. Candidates

successful at this stage are then sent the 'Candidate Overview Document UCF' which details the personality assessment and assessment process in more detail so they know what to expect and how to prepare.

#### **D. Personality Assessment**

50. The NPIA 2012 report recommended a personality assessment for selection of UCF candidates. The review found evidence that some personality characteristics were predictive of effective performance in a UC role, or may be protective factors in that they contributed to a more resilient personality type.

51. Because the job analysis showed that UCF and UCA work was very similar in terms of the characteristics of the person required to do the job effectively, and because the route to UCA selection is via UCF, it was recommended that personality assessment is only conducted as part of UCF selection. In simple terms, if the candidate's personality is suited to UCF work they will also be suited (in personality terms) to UCA work. It is essential, however, that before candidates engage in operations that are considered 'advanced' that they are subject to a thorough psychological assessment. This is explained below under UCA selection.

52. A systematic review of the research pertaining to personality assessment of undercover officers was done, including a review of established psychometric instruments which could be used to make an assessment of personality facets relevant to UC work. This research is comprehensively described in the

document 'UCF Psychometric Assessment – Research, Review and Considerations'. This is produced as **Exhibit LM/11**.

53. Once the research had been undertaken, a meeting was held on the 28th August 2014 at to determine decisions on what should be included and how the personality assessment stage should be structured to support the overall selection process. Subject matter experts were consulted as part of the meeting and in-depth discussions were held.

54. The workshop considered:

- Benefits and limitations of the current personality questionnaires being used including robustness of measures, cost and practicality of use.
- Fundamental core personality attributes that were necessary to focus on as part of the assessment
- Methodology of conducting testing sessions and interviews
- Security of assessment and testing information and documents
- logistical implications such as time needed to conduct tests, appropriate locations, logistics such as on-line or paper and pencil, where they should be held and cost implications of locations, structure and format of process and supporting documents/guidance/reports, pre-interview preparation, telephone vs face-to-face, report structure, grading of assessments

55. As a result of this review process and evidence based approach, two well developed, appropriate and validated personality questionnaires were chosen to support the personality assessment stage.

56. The 'Unit Overview Document UCF' provides more details about the personality assessment and the rest of the assessment process. There is also a 'Candidate Overview Document UCF' which describes the entire selection process from the candidate's point of view. These documents are provided as **Exhibit LM/12** and **Exhibit LM/13** respectively.

57. In addition there is guidance for those conducting the personality assessment ('Personality Assessment Interview Guidance for Assessors – Jan 17' and 'Personality Assessment Report Guidance'. These documents are provided as **Exhibit LM/14** and **Exhibit LM/15** respectively.

58. All of the Assessors who support the personality assessment interviews are provided from a bank of qualified and approved Assessors held by the College of Policing. This ensures that all Assessors have met the specific requirements for the role, which includes holding the necessary qualifications, skills, training and depth of experience. All Assessors on the bank are security cleared to the appropriate level and have attended a workshop specific to the role, before being considered competent for the work. The role profile document is produced as **Exhibit LM/16**.

59. All of the Assessors undergo quality assurance to ensure the standard of both their assessments and reports are evidence based, consistent and continue to meet the required standards set out for the work. This includes quality assurance of the Personality Assessment Interview on an annual basis and dip sampling of candidate reports to ensure they meet the required standard. The report writing quality checklist is an appendix in the 'Personality Assessment Report Guidance' (produced as **Exhibit LM/15**).
60. Feedback is provided directly to the Assessor and recorded on the Approved Assessor bank database.
61. To support the development of a bank of approved assessors for personality assessment, an advert was placed on the College Associates internet page where individuals could complete an expression of interest form. A role overview was also produced detailing the specific requirements for the role. The role was described as 'personality assessor for the selection of specialist police roles' to protect the nature and confidentiality of the work. The expressions of interest were reviewed by an occupational psychologist on the team to ensure they met all of the key requirements within the advert and the role overview. If they met the requirements and they weren't already a College external Associate, their information was next assessed by the Associate panel to decide whether they were could be approved as a College Associate. All approved Associates by the panel were then invited to complete the required security clearance prior to any discussion of the specifics of the work (e.g. no reference to undercover operative selection was made).

62. Once the Associate had met the required security clearance requirements and proof was provided of their clearance, they were asked to complete a confidentiality declaration and were invited to attend a selection interview to discuss the role and they were asked to provide responses to five interview questions. The interview questions were designed to assess whether the individual further met the requirements for the role. The interview was held by two internal College Psychologists who worked on the undercover project team and all applicants were assessed using the ORCE assessment method (a standard best-practice assessment method).

63. All of those who successfully completed the interview, were then invited to attend a full day workshop at the College's [location] to provide the necessary context, guidance and requirements for the work to ensure a consistent approach across all assessors.

#### **E. Assessment Process**

64. Candidates successful at the application stage are required to complete the personality assessment followed by the assessment process.

65. A number of exercises have been designed along with supporting documentation for this process. These are; **Role Play and cover officer debrief exercise, Risk Assessment and Interview.**

66. **Role play and cover officer debrief exercise** - initially five scenarios were designed and piloted at the events described earlier during the design stages.

GIST: *The criteria applied for deciding whether to select a scenario for future use were: where units felt they fitted best as a realistic scenario*

which would elicit the key skills and behaviours from candidates in order to ascertain if they had the necessary skills to complete the role. 'Candidate instructions' describing the exercise, 'candidate materials', a 'role actor pack' detailing a scripted character and persona for the role actor to adopt to ensure consistency and an 'assessor pack', containing detailed assessor guidance and instructions on how to mark to ensure consistency between assessors were all produced. 'Invigilator Instructions' were also created. These documents are produced as **Exhibit LM/17**, **Exhibit LM/18**, **Exhibit LM/19**, **Exhibit LM/20** and **Exhibit LM/21** respectively.

67. Initially the role play was designed to be followed by a written debrief exercise in which the candidate produced a written statement of what had happened during the interaction, description of subject, etc. However, during the live pilot stages, it was found that the written element didn't allow assessors to discuss why candidates had taken the approach they had and understand their thinking and rationale behind their actions. Therefore, this element was changed to a cover officer debrief, in which the assessors take the candidate into a separate room after the scenario has finished and have a verbal debrief with them as to what they did, why, what evidence they have collected, if they would have approached it differently in the future, etc.

68. Additional supporting documents to facilitate the assessment (e.g. recording, assessment and feedback templates and records of marks sheets have also

been created for assessor use to ensure consistency in marking. These are also provided as **Exhibits LM/19a and Exhibits LM/20a, LM/20b, LM/20c and LM/20d, respectively.**

69. **Risk Assessment** - initially 10 risk assessment scenarios were created from critical scenario interviews with current operatives. They were piloted during the design stages and **#** were taken forward to be used at the assessment process. Comprehensive assessor guidance has been produced for all and all have been piloted with job holders to ensure they are at a comparable level to one another during the design stages (the exercises are simultaneously piloted on job holders who undertake the exercises as though they were candidates. The psychologists use performance and feedback to make a judgement about the appropriateness and difficulty of the exercises). Units can choose which risk assessment they wish to use for each process. This allows units to use different risk assessment exercises each time if they run several processes within a year to help stop contamination. It also offers the option for units to use more than one risk assessment during one assessment process if they have a large number of candidates and wish to prevent potential contamination of exercises (to my knowledge no unit has chosen to do this to date though).

70. Supporting documents produced for the risk assessment exercise are 'candidate instructions' **Exhibit LM/22**, 'candidate materials' **Exhibit LM/23**, 'assessor pack' **Exhibit LM/24**, and supporting assessor documentation **Exhibits LM/24a, LM/24b, LM/24c, LM/24d and LM/24e.**

71. **Interview** - A large bank of interview questions was initially developed and refined during the consultation and design process. The interview is designed to take into account the results from the personality interview, which is given to interviewers in a report. Interviewers can then choose from a predefined list of questions which would be most suitable for candidates. This allows the interview to be tailored to each candidate whilst still containing standardised questions.

72. Again, supporting documentation has been produced consisting of 'assessor pack' **Exhibit LM/25**, 'interview questions and probes' **Exhibit LM/26** and associated assessor documentation **Exhibits LM/25a, LM/25b, LM/25c, LM/25d and LM/25e**. These documents are all provided.

73. The assessment process is run primarily by units. Units are responsible for ensuring that they have two assessors available to conduct each of the exercises and the appropriate number of role players (1 or 2 depending on exercise). This information is detailed in 'Overview of UCF AP Exercises'. All assessors and role players must be subject matter experts in the field (e.g. cover officers, COM-UC, current operatives). An occupational psychologist from the College of Policing provides training to all assessors prior to the commencement of the assessment process. This consists of half a day of standardised training which covers basic assessing principles and methods of assessing followed by in depth training in each of the exercises that the assessors will assess. This ensures as far as possible that all assessors are

trained to the same national standards and assess candidates in the same, fair way. The 'Overview of UCF AP Exercises' document is produced as **Exhibit LM/26. [See correction to this paragraph at Paragraph 150]**

74. Units are responsible for sourcing appropriate locations and rooms to hold the assessment process. This is done in conjunction with the College of Policing who offer advice with this. When attending for training, the College of Policing will quality assure the rooms and set up prior to the commencement of the assessments. The occupational psychologist will then stay and quality assure at least the first day of the assessment process, and longer if requested by the unit or it is felt necessary by the occupational psychologist. This involves ensuring all assessors are observed in each role and feedback provided to ensure as far as possible a consistent and standard approach nationally. If there are any concerns, the College will work with that assessor to retrain and ensure they meet the required standard. If this still does not occur, the COM-UC will be informed and that assessor will be removed from the assessment process. To date, and to the best of my knowledge, this has not occurred. There is no specific written guidance for quality assurers in this particular process. However all quality assurers are chartered occupational psychologists or trainees within the Selection and Assessment department who have been involved in the design and delivery of College assessment processes and who work to professional assessment centre standards. The department meets the international standard for Assessment Service Delivery - ISO 10667. The ISO is an independent, non-governmental international organisation with a membership of national standards bodies. The

organisation brings together experts to share knowledge and develop international standards.

75. Units are responsible for the coordination of the assessment process, including the timetables. The College of Policing have example timetables that Units are provided with and can provide support and advice where necessary. A number of other documents are sent to units for their use during the assessment process including room signs, 'confidentiality declaration' (**Exhibit LM/27**) for candidates to sign, 'Candidate Briefing UCF' (**Exhibit LM/28**) notes to ensure all candidates receive the same information (the delivery of this is quality assured by the College of Policing), 'candidate feedback' (**Exhibit LM/29**) and 'assessor feedback' (**Exhibit LM/30**) questionnaires, 'equipment list' (**Exhibit LM/31**), and 'print list' (**Exhibit LM/32**). These documents are provided with the exception of timetables which are blank templates and room signs which simply say 'Interview Room' or 'Role Play Prep Room' for example.

76. All exercise content and interview questions are planned to be updated on an annual basis. Due to the staggered roll out of the process, the first full review of the full process is currently being conducted and exercise content is planned to be changed in 2017. The review involves consultation with all units to review the current process, critical scenario interviews with operatives to gain up to date and realistic scenarios to base the exercise content upon and exercise consultation and pilot events again to fully test the new materials before they go live.

## **F. Decision making and feedback**

77.A comprehensive guidance document 'UCF Decision Making Guidance' (**Exhibit LM/33**) has been produced to support the process of assimilating the scores and qualitative information from the assessment process and making a decision about whether individuals meet the standard or not. There is also a summary of marks sheet (**Exhibit LM/34**) for collecting all scores and final decision. All units are required to hold a decision making session at the end of the assessment process, in which the performance of all candidates is discussed across all exercises, along with any concerns raised at the personality stage. The College of Policing can support this stage where required. The units are asked to send the final decision making paperwork to the College and College staff quality assure the workings-out and check the decisions against the guidelines. Where a candidate has reached the necessary standard, but there are some concerns, the unit can decide whether or not to progress the candidate to training. They cannot however progress a candidate who failed to reach the required standard. All candidates receive feedback from the units as to their performance and a developmental record is produced for each candidate detailing their performance. This is shared with the candidate but held by the unit and can be used during training and if successful in the role as deemed appropriate.

### **College record selection activity across regions**

78.The College keeps records of the results and outcomes of each candidate at each assessment process and their personality assessment reports. These

are stored securely and password protected in folders that are only accessible by staff with a need to know. This also provides a record of which forces have run UCF assessment processes and the dates. For the UCA process the College keeps data on candidates' results and outcomes. An example is provided: 'Overall Summary of Marks Sheet – Anonymised'. This is produced as **Exhibit LM/36**.

## **UCA**

79. The UCA process is similar in terms of the documentation and stages. To avoid duplication of information, documentation has only been provided for the UCF process. Documentation is provided for Psychological Assessment as this is unique to the UCA process. The content of the exercises and requirement for what the candidate demonstrates are obviously set at a different level. Due to the [REDACTED] number of UCAs required annually, the UCA process is coordinated by the College of Policing on behalf of units and units support the process by providing subject matter experts to assist at each stage:

### **A. Advertising**

80. Advertising of the role is conducted at a Unit level. Because UCA selection is only open to those who are already trained UCFs, the advertising is only done within the UC community. Units are encouraged to identify those who may have potential to become UCA and encourage them to apply if they wish to and to have one to one conversations with potential candidates to discuss

whether they have the appropriate level of experience and whether the time is right for them to apply.

### **B. Open Day**

81. The open day is held nationally by the College of Policing and is supported by units and NUWG members, who input into the day by providing information on varying aspects. Candidates who wish to progress applications are given the realistic job preview containing self-selection questionnaire to consider.

### **C. Application form**

82. A national application has been produced and is completed by candidates. A national sifting event of all applications is coordinated by the College. Units who have candidates applying are asked to support the event by sending subject matter experts to assess. Other units also support the event by acting as assessors. The College provides training to all assessors prior to assessing the application forms on how to assess to ensure a national and consistent approach is taken. Occupational Psychologists from the College then quality assure the assessing and provide guidance and support throughout. This is then followed by a decision making process when all applicants are discussed in turn. This is overseen by the College. As with the UCF process, associated documentation has been produced to support this stage. There are some minor differences between the UCF and UCA documentation which reflects the fact that the process is centrally run rather than regionally, however the assessment process is run on the same principles as the UCF process to the same quality standards.

83. Successful candidates then receive the candidate overview document detailing the next stages of the assessment process.

#### **D. Psychological Assessment**

84. Because an assessment of general personality suitability has been conducted at UCF, there is no requirement to repeat it at UCA. However, given the increased risks associated with UCA work, especially that involving infiltration and longer term immersion into a UC environment, there is a requirement for a psychological assessment of current psychological stability and suitability to undertake advanced operations.

85. Psychological assessments are conducted by the clinical psychologists who are part of the College's group of approved practitioners (this is detailed in the 'Support' section of this statement).

86. Full and comprehensive guidance is provided to units to assist them in managing the process. This is produced in document 'UCA Psychological Assessment Selection Process Requirements' and is exhibited as **Exhibit LM/37**. Comprehensive guidance for approved practitioners in conducting the assessment and writing summary reports is detailed in 'UCA Selection Process Psychological Assessment for Selection Practitioner Guidance'. This is produced as **Exhibit LM/38**.

#### **Personality Assessment used for UCF selection and the psychological assessment for UCA selection**

87. In order to be clear about the difference between Personality Assessment at UCF Selection and Psychological Assessment at UCA Selection: The former is conducted by occupational psychologists to make an assessment of the candidate's trait-based suitability for UC work. This is similar to selection processes for any role – whereby the facets of the candidate's personality can be compared to a 'profile' for the role which contains evidence based information about what personality traits are likely to make someone effective in that role. In the case of UCF personality assessment the report will cover positive suitability factors e.g. propensity to make relationships easily, along with risk factors such as a tendency to worry, or risky decision making. **(Exhibit LM/14** is produced in order to provide further detail).

88. Personality traits have been shown to be generally stable (although emotional stability is more prone to variation due to life events). The personality assessment is not repeated at UCA due to the stable nature of personality and the fact that UCA candidates have generally experienced UCF work and demonstrate their suitability in their work. (On occasion Clinical Psychologists may choose to use personality measures of the same or different type to support their psychological assessment – this is at their clinical discretion).

89. The Psychological Assessment is a more in depth clinical assessment (conducted by a clinical psychologist) looking at mental health and stability with a view to identifying any risk factors which could make an individual unsuitable for more advanced UC work where they will potentially be immersed in a UC role and where they are not as closely supervised, or

where they may encounter psychologically toxic environments such as exposure to extreme violence or CSE (child sexual exploitation), for example. Clinical psychological assessment is not normally conducted in selection for jobs – it is the specific high risk nature of the role (both in terms of physical and psychological risk) which requires a more in depth assessment. Whilst there are certainly risks involved in Foundation level work, the research conducted in 2012 showed that these risks were not usually psychological and could be compared to the risks faced by Police Officers in many other non-covert roles. Where any UC is exposed to any kind of trauma, they always have access to psychological support when needed.

90. For clarity, psychological assessment is not restricted to UCA selection. It is also recommended that a psychological assessment is undertaken on any UC (UCF/UCA/UC Online) who is undertaking work that has potential to be especially psychologically demanding or difficult (this might include but not limited to investigations into Child Sexual Exploitation or violent extremism). Psychological Assessment is also part of the UC Online selection process (see Para 128-132).

### **E. Assessment Process**

91. The assessment process consists of the same exercises and associated documents as the UCF process and was designed in the same way with consultation with COM-UCs, cover officers and current operatives. The content of all exercises is however set at a higher level to reflect the differences in the roles and what is expected. These differences and expectations are explicitly laid out in the assessor guidance documents.

Again, the assessment process consists of a cover officer debrief rather than the originally designed written exercise for reasons outlined earlier. The report from the psychological assessment feeds into the interview in the same way as the personality assessment does for UCF candidates.

92. The assessment process is coordinated by the College of Policing and supported by units who release subject matter experts to perform the roles of assessors and role players. All assessors and role players receive comprehensive training beforehand regarding how to assess and in each of the exercises they will be assessing. Occupational psychologists from the College are responsible for running the assessment process, coordinating logistics and quality assuring assessors. Again, assessors are required to comply with professional assessment standards and are given feedback throughout to ensure this occurs. (Professional assessment standards are those detailed in the international standard for Assessment Service Delivery - ISO 10667 and the British Psychological Society's Assessment Centre Standards).

#### **F. Decision making and feedback**

96. As with the UCF process, documents have been produced to support this stage. A full discussion of each candidate's performance along with any concerns raised in the psychological assessment takes place, overseen by the College of Policing. Again, candidates receive detailed feedback on their performance at the assessment process.

### **UCA selection processes**

97. The records relating to these processes have been archived from the system and I have been unable to access the original records in the time available, however I have data from a previous analysis which suggests that the dates and numbers were as follows: **[See correction to this data at Paragraph 178]**

- [redacted] 2015 - [redacted] attended, [redacted] were successful [52.2% pass rate]
- [redacted] 2016 – [redacted] attended, [redacted] were successful [75% pass rate]

More than two such processes have now been delivered and the details are provided below:

- [redacted] 2017 – [redacted] attended, [redacted] were successful [78.8% pass rate]

**The delivery model for future selection processes and the “menu of options from which forces/units may choose”.**

98. At the time of David Tucker’s original statement to which the rule 9 request refers, it was unclear what format the UCA selection process would be delivered in. A regional model was considered whereby forces would deliver the UCA process at a regional level (similar to the UCF model), however [redacted]

[GIST: It was concluded that this would be impractical (reasons redacted)]

[redacted] and would slow down the recruitment process.

99. In a regional model the 'menu of options' would have been the level of support provided by the College, ranging from a fully supported model to simply providing support with psychological assessment and quality assurance. Given the impracticality of those options it was decided by the College in consultation with NUWG that the UCA selection process would be centrally delivered by the College as a national process.

100. This enables the process to be developed and improved at a national level and for feedback to feed in to training. There are no plans currently to run the UCA process as a regionally or locally delivered model.

#### **SUPPORT and MENTAL WELLBEING**

101. The actions in the HMIC Action Plan specifically relating to the Mental Wellbeing work stream were:

102. *The College of Policing should issue a policy that requires the creation of a standing group of psychologists and psychiatrists with experience of providing psychological assessments for individuals operating in high-risk or safety-critical roles or environments. AMENDED College of Policing to establish and maintain an approved group of clinical psychologists and psychiatrists with experience of providing psychological assessments for individuals operating in high-risk or safety-critical roles or environments.*

103. *Chief constables, the heads of law enforcement agencies, the National Crime Business Area and the College of Policing should establish and*

*implement consistent national psychological support for all undercover officers.*

104. Specifically the work undertaken since February 2014 under the 'Support' work stream was as follows:

- Research and production of a process and associated guidance for all persons involved in the provision of psychological assessment and mental wellbeing to UC units 'Psychological Assessment and Mental Wellbeing Support for Undercover Operatives'. This document is produced as **Exhibit LM/39**.
- Provision of material for inclusion in selection processes to enable the integration of mental wellbeing considerations from the initial recruitment stages.
- Production of guidance material and training material for UCF and UCA training, and Cover Officer Training. These materials are referenced in the statement of Mr Gary McFadden in response to the Inquiries' Rule 9(6) request of 09/12/2016 and submitted on 06/02/2017 which refers to the training of undercover officers.
- Consideration of a number of models of provision of the 'list' of psychologists and psychiatrists who would provide the psychological assessment services and subsequent establishment of the list
- Guidance for Psychologists providing ongoing psychological assessments: 'Ongoing Psychological Assessment – Practitioner Guidance'. This document is produced as **Exhibit LM/40**.

#### **Engagement with existing providers**

105. As part of the design work for the above products the College team engaged with the existing clinical psychologist providers of psychological services to UC units, as well as established clinical psychologists who had not worked with UCs before.

106. As well as one to one meetings and 'phone calls with the service providers and additional psychologists, the College also held an exploration session with clinical psychologists both from within and outside the UC field.

107. Alternative models of support were also considered such as Peer Support networks (e.g. TRiM (Trauma Risk Management)) to enable us to evaluate their potential effectiveness in providing support to UCs.

#### **Engagement with Heads of Unit/Com UCs**

108. In addition to the psychological content of the guidance documents, it was important for the guidance to reflect and work with the practicalities of UC units therefore the College worked with COM-UCs to consider issues like security, delivery practicalities, Home and Deploying units responsibilities, and requirements for report writing and storage.

#### **Guidance - Ongoing Psychological Assessment for Undercover Officers**

109. The document referred to above 'Psychological Assessment and Mental Wellbeing Support for Undercover Operatives', outlines the process established by the College on the provision of psychological assessment and mental wellbeing support.

110. That document provides a detailed explanation of the circumstances in which ongoing psychological assessment is conducted. However in brief ongoing psychological assessment is required:

- Every **# months** and at the start and end of significant deployments for all UCAs
- Undercover Online Operatives (UCOL/O) should have a psychological assessment **[twice as often]** and at the start and end of a significant deployment, as well as prior to UCOL training.
- Psychological assessment should be conducted whenever a UCO, Cover Officer, or COM-UC has concerns about the wellbeing or safety of a UCO (regardless of status or role), or if a UCO seeks professional help or is experiencing or showing signs of stress, or has experienced trauma.

111. The purpose of ongoing psychological assessments is for the Clinical Psychologist to make an assessment of the UCO's fitness to deploy, and where they have concerns, to make recommendations for restrictions to deployments or further referrals for treatment or mental well-being support. At the same time the psychologists have a preventative function in that they can assist the UCO in processing and managing any emerging concerns before they become problematic.

112. The relationship between psychologist and UCO and specific information divulged by the UCO is confidential however the psychologist has a duty to inform the COM-UC if they have serious concerns about the wellbeing or safety of the UCO, other operatives or members of the public, or

about the ethics or legality of the UCOs activities. It should always be clear to the UCO what information will be shared, with whom and how this will be done.

113. Alongside the general guidance document referred to above, there is additional guidance for practitioners to enable standardised delivery of the psychological assessment service across providers. Actual methods are left to the professional judgement of the psychologists but there are minimum standards and guidelines that should be adhered to. 'Ongoing Psychological Assessment – Practitioner Guidance'. This document is produced as **Exhibit LM/40**.

### **Mental Wellbeing Support**

114. Where there is a need for the UCO to be referred for treatment or support, the clinical psychologist refers the UCO to an appropriate practitioner with appropriate security clearance. This may be another provider on the College of Policing list of approved providers but the person who provides psychological assessment should not also provide treatment for the same UCO.

### **Guidance – Cover Officers and UCOs**

115. The initial production of guidance for Cover Officers was done by an associate of the College who had worked in the UC field for over 20 years and who was an experienced clinical forensic psychologist. The document was not

used in that format but was further developed by the College into guidance for Cover Officers detailing the Cover Officer's responsibilities for the support of undercover officers. This document ultimately became part of the pre-course reading for Cover Officers. Some of the content was also modified to provide guidance for Undercover Officers, which also became part of the pre-course reading for all those attending the UCF or UCA training courses.

### **Training sessions**

116. During the initial training for all UCF, UCA and UC Online officers there is a session on mental wellbeing, which covers:

- UCO's responsibilities in relation to maintaining their own psychological fitness
- The link between UCOs mental wellbeing and performance
- Recognising signs of trauma or excessive pressure/stress
- Increasing personal resilience
- Identifying sources of support.

117. For Cover Officers the mental wellbeing session covers:

- the importance of facilitating the mental wellbeing and performance of UCs
- the importance of creating a positive environment in which UCs are empowered and encouraged to take personal responsibility for their mental health and wellbeing
- how cover officers can spot concerns and provide support to UCOs

## Approved Practitioners for psychological support

118. Prior to setting up the list of psychologists a considerable amount of work was done to specify the 'scope of work' for the psychologists and establish what was expected of them in terms of both selection and assessment and ongoing assessment for fitness to deploy.

119. There were some delays to this part of the project due to the restructuring of the College – the initial proposal had been that Psychologists would be associates of the College and that the College would provide a standardised service to UC units via the associates. It became apparent as the role of College of Policing became more clear throughout 2015 that an associate model was not appropriate and that the College would instead simply hold a record of those psychologists who met the requirement to provide services to undercover units. The supplier relationship is strictly between the provider and the employing force or organisation.

120. The initial group of clinical psychologists consisted of all those who were currently (in January 2016) providing psychological services to UC units and who met the criteria set out by the College. Please see the 'Job Description for Clinical Psychologists' for details of the criteria which is produced as **Exhibit LM/41**.

121. This group of psychologists attended a briefing in January 2016 where they were briefed on the aims of the psychological support provision. In summary the objectives of the briefing were for psychologists:

- To understand the background and changes to psychological assessment for UCOs
- To understand the current processes for psychological assessment
- To set standards and expectations
- To explore guidance documents
- To share best practice
- To develop a support network with other providers
- To answer questions and discuss any concerns

122. Units whose psychological support providers did not meet the new criteria were advised by the College during 2014 and 2015 that they would need to seek another provider.

123. To my knowledge there were two providers that were no longer able to be used and the forces concerned were able to fill the gap by utilising an existing provider of UC services from an adjacent locality. **[See correction to this paragraph at paragraph 205]**

### **Quality Assurance**

124. The College then worked to develop supporting materials and a quality assurance process which it intends to begin delivering in 2017.

125. The quality assurance process will seek as a minimum feedback from COM-UCs and UCs on the effectiveness of the provision, checking adherence to processes and dip-sampling reports. Providers will be supported to improve their service where necessary but in the case of significant or sustained performance deficits the force will be advised to seek alternative provision. This process is as yet not underway, to allow time for the new processes to be embedded enough to evaluate. There have however been communications with providers and units within this time to support both in implementing the new process and making improvements where possible.

#### **Recruitment and Selection Processes and Mental Wellbeing**

126. The new selection processes for UCA and UCF (and now UCOLO – see below) were designed with the aim of putting personal responsibility at the centre of them. This is achieved through:

- The realistic job preview (RJP) which is given to candidates attending the Open Day. It highlights the realities of the demands of the role and the selection process, potential impact on the officer's family, personal and professional life and the importance of personal responsibility, especially for one's own mental wellbeing.
- The RJP also includes a self-selection questionnaire to encourage the candidate to reflect on their suitability for the role. There are specific items on mental wellbeing and resilience.
- Open day – this continues the themes introduced in the RJP and Self Selection Questionnaire to ensure the candidate fully appreciates the

challenges of the role and has thoroughly considered their suitability for it. The open day gives a realistic picture of the type of work they will do and also there is a specific section on mental wellbeing to highlight the considerations they need to make and the type of support available.

- The Application Form contains a specific question which highlights the importance of taking responsibility for their own mental wellbeing and asks them to explain how they currently do this and how they plan to do it in the role. Assessors are provided with guidance on how to consider the responses to the question as part of the sifting guidance for the application form and this is taken into account at this stage.
- During the Personality Assessment and Psychological Assessment the approved providers ensure the consideration of mental wellbeing is highlighted with officers and test that the officer has properly considered the role and its impact on them.
- Selection process – mental wellbeing considerations are explicitly fed into the interview based on the outcomes of the personality or psychological assessment. Mental wellbeing is also highlighted in other exercises to ensure candidates are reminded of its importance. Their responses are considered by the assessors along with other aspects of their performance. The specific questions and considerations in relation to mental wellbeing can be seen in the exercise related documentation provided.
- Candidates also receive feedback on their performance at the assessment centre which contributes to their ongoing self-awareness.

- The College does not run selection processes for Cover Officers however it does run a training course for cover officers which includes a session on mental wellbeing, and this is also covered in the pre-course reading.

127. The development of the approved list of practitioners (and the associated guidance and processes) contributes to a robust framework of support by:

- Ensuring that those providing the services (for either Personality Assessment or Psychological Assessment) are appropriately qualified, vetted and trained with experience and knowledge of this area of work.
- Ensuring that the personality or psychological assessment process is standardised across different providers and expectations are set at a high level.
- Providing COM-UCs (who are generally not experts in psychology or assessment) with an understanding of the purpose of the assessments and what services and standards they should expect from the providers.
- Providing clarity of roles and responsibilities and making processes transparent to increase trust amongst officers and managers.
- Encouraging a culture change by normalising discussions around mental health and wellbeing, reducing stigma associated with needing help.
- Creating a professional network of providers to enable sharing of good practice and concerns.
- Enabling quality assurance and checking of individual providers' understanding and performance against standardised expectations.

- Providing a central resource for both providers and units to raise questions or concerns and provide guidance and support to enable high quality provision.

### **Undercover Online (UCOL)**

128. Undercover Online (UCOL) work was excluded from the original research in 2012 at the request of the Client because it was seen as being significantly different from UCF/UCA.

129. HMIC made recommendations in their 2014 report around the importance of defining the UCOL role and so this was included as part of the HMIC action plan.

130. The College worked with the NUWG lead for the UC Online work stream to establish a definition and conducted a job analysis to identify key features of the role and those undertaking it. The job analysis followed a similar process to the original 2012 research, albeit smaller scale.

131. The College made recommendations for changes to the UCOL Selection and Training pathway (these are detailed in the report 'UCOL Proposal Paper Final 2.0' which is produced as **Exhibit LM/35**) and subsequently have undertaken to design and pilot a selection process for those officers who undertake to do undercover online work only (UCOLO).

## **Tenure and reintegration**

132. The HMIC made recommendations about tenure and reintegration of undercover officers as follows:

133. *The College of Policing should establish and promulgate a comprehensive policy regarding maximum lengths of tenure for foundation and advanced undercover officers. We consider that a period of three years tenure for a foundation undercover officer and a period between five and seven years tenure for an advanced undercover officer is appropriate. AMENDED: Tenure policy to be devised that ensures undercover officers experience a broad range of policing to ensure they have professional development and operate in other policing environments so that they remain abreast of developments in all areas of policing.*

134. I have included this in the statement because of links to wellbeing although wellbeing is not the sole purpose of tenure.

135. The College of policing worked with the NUWG National Programme Lead to develop a tenure policy that met the agreed action described above. A proposed tenure policy was produced and submitted to the NUWG for consideration and approval. It is my understanding that the guidance for tenure and reintegration for UC operatives was approved and will be incorporated into Approved Professional Practice (APP).

I believe that facts stated above in this statement are true.

Dated the        day of March 2017

Signed.....

136.        I shall now respond to the questions and clarifications posed in the supplementary Rule 9(5A) request dated 30<sup>th</sup> June 2017:

***1. Please detail the basis for the conclusion that there had been no involvement of the NPIA or its predecessor organisations in the selection, assessment or support of undercover officers before the letter in 2011 (see paragraph 11). For example, the College of Policing has explained in letters dated 15 January 2016 (page 3), 29 April 2016 (page 3) and 7 February 2017 (page 7) that the College has secured the email accounts and home drives of people who may have had a connection to undercover work but have left the College, and in a letter dated 5 August 2016 (page 6) the College explained that it is possible to search the email accounts, however it is not clear whether any searching or review of those email accounts and home drives has been undertaken in order to come to the conclusion expressed here. Please explain the review methodology that you adopted in relation to all repositories which may contain material relating to predecessor organisations (both hard-copy and electronic) and provide a list of any search terms used.***

137.        The Head of the Examinations and Assessment Unit at the time this work was commissioned **PN0004** had been in that role unit for some number of years. Any work conducted by the NPIA or Centrex in the

area of selection and assessment would have most likely been overseen by him as head of Examinations and Assessment. In conversations with him I ascertained that there had been no involvement in this by the NPIA or predecessor organisations. The head of Examinations and Assessment was aware that psychological or personality assessment had many years ago been conducted by psychologists in the Metropolitan Police Service where he had previously worked, but that the work was subsequently outsourced. My understanding is that this work was then conducted by an independent consultant (Please refer to **Exhibit LM/43**) who continued to work in this field and currently provides services to the College as an associate (Personality Assessment for foundation undercover officer selection). I did not conduct any searches of email or computer accounts as there was (and still is) no reason to suspect that there was anyone else in the College or predecessor organisations who had had prior involvement in this work, other than the ones who became involved when the work was commissioned in 2011. The email accounts referred to in the question i.e.: ***'the College has secured the email accounts and home drives of people who may have had a connection to undercover work but have left the College'*** refers to those who may have had a connection because they have been involved in selection and assessment or other areas of work for undercover officers since 2011, or alternatively, in training or other work in previous years.

***2. Please clarify the reference in paragraph 20 to "para k25". Should the reference be to paragraph 23?***

138. The reference “k25” should, in fact, read “para 23”.

**3. How many and which undercover units, and approximately how many COM-UCs, cover officers and operatives were involved with the design of the national selection processes, as referred to in paragraphs 36 and 38?**

139. **GIST: Heads of Unit (COM-UCs), cover officers and operatives from 12 named Forces/Agencies were involved in the design work.**

**4. Should the reference to “paragraphs 44-96” in paragraph 37 in fact be a reference to paragraphs 42-96?**

140. The reference “paragraph 44-96” in Paragraph 37 should in fact read “paragraphs 42-96”

**5. Which “subject matter experts” were consulted as part of the meeting to determine the personality assessment stage and who else was part of that meeting in August 2014 (see paragraph 53)?**

141. To the best of my knowledge only 3 external providers (considered Subject Matter Experts) were engaged in delivering any personality

assessment for UCF and UCA at that time. Two were present at the meeting and the third was unavailable. The two external providers who were at the meeting are indicated in **Exhibit LM/43** 'CoP Psychologists v2'.

142. Three members of the project team within the College were also present at the meeting. These are also indicated in **Exhibit LM/43**.

***6. Is the bank of assessors who support the personality assessment interviews (referred to in paragraph 58) different to the list of professional practitioners which undercover units can access to ensure proper assessment of and support for undercover operatives (which has already been provided to the Inquiry under the second s.21 notice)? If different, please provide a list of all such assessors. (The Inquiry seeks this information in order to identify potential witnesses; if inclusion of the names in the consolidated witness statement would cause the statement to acquire a security classification that it would not otherwise attract, the Inquiry is content to receive some or all of this information in a separate document. If names are provided separately, please ensure that this is apparent on the face of the statement.)***

143. Yes. The list provided to the inquiry under the second s.21 notice provided the names of the clinical psychological practitioners who provide ongoing psychological assessment or psychological assessment for advanced selection. The same list also provided the names of those providing personality assessment (occupational psychologists) and this was broken down into those who provide this service as associates and those who are employees of the College. For the avoidance of doubt, the occupational

psychologists who provide personality assessment are different from the clinical psychologists who provide psychological assessment. I will provide an updated version of the list provided under the s.21 notice listing those who have been added since the first version was supplied and making clearer which roles each person/group undertakes. The names are supplied separately as **Exhibit LM/43** 'CoP Psychologists v2'

***7. Please provide further detail as to how the assessors who support the personality assessment interviews are approved and details of the workshop attended by all the assessors, referred to in paragraphs 58 and 63, including any documents used.***

144. As part of the recruitment of external associates an advert was placed on the College Associates internet page where individuals could complete an expression of interest form. The specific requirements for the role were defined in the Role Profile already supplied (**Exhibit LM/16**). The expressions of interest were reviewed by an occupational psychologist on the team to ensure they met all of the key requirements within the advert and the role overview. If they met the requirements and they weren't already a College external Associate, their information was next assessed by the Associate panel to decide whether they were could be approved as a College Associate. All approved Associates by the panel were then invited to complete the required security clearance prior to any discussion of the specifics of the work.

145. Once the Associate had met the required security clearance requirements and proof was provided of their clearance, they were asked to

complete a confidentiality declaration and were invited to attend a selection interview. The interview was designed to assess whether the individual further met the requirements for the role. The interview was held by two internal College Psychologists who worked on the undercover project team and all applicants were assessed using the ORCE (Observe, Record, Classify, Evaluate) assessment method.

146. Those successful at interview, were then invited to attend a full day workshop at the **College's location** to provide the necessary context, guidance and requirements for the work to ensure a consistent approach across all assessors.

147. The workshop covered the following:

- History and background to the project
- Competencies assessed (UC Competencies)
- Selection Process Overview
- How Personality Assessment support the Selection Process
- Demands and rewards of the operative role e.g. stressors of role, personal responsibility, impact on home and work life
- Detailed coverage of the Personality Assessment stage and expectations of Psychologist – what candidates are asked to do, preparing for the assessment (what to consider, supporting tools and guidance, how to hold the assessment interview e.g. introduction, confidentiality, importance of validating the personality profiles through

objective and appropriate questions), Report writing requirements and how to assign levels of concern for candidates when producing report

- How to deal with upset or distressed candidates
- Consideration of socially desirable responses
- Protocols and requirements for submitting completed candidate reports
- Post assessment protocols and requirements
- Reminders about security and confidentiality- clearly defined do's and don'ts

148. The slides for the workshop are included at **Exhibit LM/44** 'Personality Assessment- workshop slides 17'

149. Psychologists working within the Selection and Assessment department, who facilitate Personality Assessment Interviews attended the Personality Assessment workshop to cover the requirements and specifics of the work/role and provide all of the necessary guidance and context. This was done using the same workshop slides that were produced for the initial workshop with the Associates. Two of the Selection and Assessment Psychologists attended this initial workshop alongside the Associates. Any additional Selection and Assessment Psychologists identified after this initial workshop attended at a later date. All of the Selection and Assessment Psychologists had to meet the necessary qualifications and requirements for the role (e.g. MSc Occupational Psychology, NEO and 16pf certified and trained etc.). They were also required to complete the required security clearance prior to attending the workshop and commencing any assessments.

They are quality assured to the same requirements as the Associates supporting this work.

**8. Please include a correction to paragraph 73 to reflect the correct exhibit number for this exhibit, as previously indicated.**

150. The reference LM/26 in Paragraph 73 should in fact read LM/26a.

**9. Aside from that which is contained in what is now exhibit LM/26a, please provide further detail on the half-day of training provided to the assessors who conduct the assessment (excluding the personality assessment) and role-players as part of the UCF selection process (referred to in paragraph 73) and any associated documents. Please also provide the equivalent detail and any documents relating to the UCA selection process (referred to in paragraph 92).**

151. The half-day UCF Assessment Centre Assessor Training session is delivered by College of Policing Occupational Psychologists and provides assessors and role actors with information and practical advice and guidance in order to ensure they understand the expectations of their role during the assessment centre, including the information on the quality assurance process.

152. The Assessor Training presentation is delivered to support the training elements to all assessors and role actors to ensure all receive the same information.

- Background, aim and overview of the selection process
- The role of the assessor
- Assessment process timetable and logistics
- Competencies
- Unconscious bias and barriers to effective assessment
- ORCE model of assessment- breaking down in to the distinct 4 stages-  
Observe, Record, Classify and Evaluate
- Allocating the correct competency grades and overall exercise mark
- Summary report writing
- Overall decision making
- Exercise specific training- breaking down in to the exercises- Role  
Play, Interview and Risk Assessment

153. Exercise specific training is completed, using presentation slides and referring to the exercise specific Assessor Packs.

154. Assessors review and discuss the exercise material for that exercise, the logistics associated with the exercise (timings etc.), any invigilation instructions and conduct a benchmarking exercise to ensure all assessors are marking candidates against a consistent standard. They also discuss the assessor guidance provided within the assessor packs, so they are clear where the evidence provided by candidates should be rewarded against the competency areas.

155. Role actors for the role play exercise will conduct a practice role play which is observed by the assessors and trainer to ensure that all background information has been accurately recalled and there is consistency in demeanour and delivery of information by each role actor.
156. The Interview Assessors do a practice exercise on how to select the most appropriate interview questions from the bank of questions provided, using the candidate Personality Assessment Reports and Application Form.
157. The quality assurance team (College of Policing Occupational Psychologists) provide feedback on any area that requires addressing and must be satisfied that the quality of the assessing benchmarking exercise and the role acting before the commencement of the Assessment Process.
158. The UCF and UCA training sessions are similar – the only differences being the information specific to the process being run, for example, specific exercises being used and timetable. Training slide decks are provided as **Exhibit LM/45** ‘UCF Assessor Training Stage 1’, **LM/46** ‘UCF Assessor Training Stage 2’, and **LM/47**, ‘UCA Assessor Training’.

***10. Please provide an update on the review process currently being conducted of all exercise content and interview questions, as per paragraph 76.***

159. A review of the UCF and UCA Selection Processes was started in August 2016. The aim was to review the processes as a whole gathering

information from those involved in the processes (COM-UCs, Cover Officers, operatives, occupational psychologists and clinical psychologists) to see what worked well and what could be improved at each point of the processes. A review of the exercise content was planned for 2017. The August 16 review mainly highlighted possible improvements to the personality assessment for UCF in terms of when the personality assessment was carried out and the reporting of the personality assessment itself.

160. Two different trials were carried out. Essentially the trials looked at whether it would be appropriate to split the assessment process up so that the role play could be conducted before the personality assessment, and the interview and risk assessment after the personality assessment. This was to meet units' needs of reducing the cost of the assessment by conducting it in stages – thereby avoiding costs of assessing candidates who did not pass the roleplay. The personality assessment report was also amended and trialled during this time – it was adjusted to make it easier for assessors to use by condensing the areas within the report to link more clearly to the interview and focusing the content of the report to the needs of the assessors.

161. Following the trial all feedback and results were collected and the team consolidated the results to determine what should be changed in the process and how, so to maintain the confidentiality, integrity and standardisation of the process. The changes made to the personality assessment report were

upheld and the UCF assessment process was changed from having the personality assessment before the assessment process to the following:

162. Stage 1- Role Play exercise only (those candidates successful then progress to

- Stage 2A- Personality Assessment
- Stage 2B- Risk Assessment and Interview

163. This change meant that only those candidates successful at the Role Play progressed to the next stage of 2A and B. This meant a financial saving for the units and also meant that candidates who were not successful at Role Play are not exposed to the other Assessment Process exercises or the Personality Assessment. This was launched in March 2017. Quality Assurance is now provided at both stage 1 and 2B by a College Occupational Psychologist. The outcomes of this change will be monitored to ensure the process remains of a high standard and fit for purpose and to ensure that all parts of the process are adding value.

164. The next stage to this review is to update the exercises for the UCF, UCA and UCOLO Assessment Processes. This is currently underway and covers the following:

165. The interviews are being reviewed to identify which questions are most effective and whether further questions can be developed to better support

the personality or psychological assessment report. It will also look at the number and format of questions to ensure they are fit for purpose.

166. Role Play Exercises- Critical Scenario Interviews (“CSI”) being conducted with SME’s to obtain ideas for new Role Play scenarios. Following the CSI’s, new scenario and role actor background and lines will be drafted for review by SMEs. The Role Plays will be updated following the exercise consultation and will then be piloted and/or further reviewed to make any further necessary updates.

167. Risk Assessment Exercises- CSI’s being conducted with SME’s to obtain ideas for new Risk Assessment scenarios. Following the CSI’s, the Risk Assessment new scenarios will be drafted for review by SMEs at an exercise consultation. The Risk Assessments will be updated following the exercise consultation and will then be piloted and/or further reviewed to make any further necessary updates.

***11. Has any guidance been provided by the College of Policing to undercover units regarding the secure retention of all documents relating to an undercover operative’s selection and their developmental record (referred to in paragraph 77) so that in due course the material can be treated as unused material under the CPIA should an operation lead to court proceedings?***

168. Guidance in exhibit LM/39, previously submitted, guides the COM UC to seek the advice of their force operational security adviser on the secure

storage and transfer of documentation but this remains the responsibility of the unit. The College has not provided any guidance about the retention of selection and development documentation, for use in court proceedings, to the best of my knowledge.

**12. Further to paragraph 78, how many forces have run UCF assessment processes and on how many occasions? Please provide the dates, the number of applicants and the number of successful officers.**

169. The table below shows all UCF processes run to date since April 2016  
**[See correction to this data at Paragraph 233].**

Unit/Date		Total (sifted)	Successful (Recommended)	Success rate %
[REDACTED]	[REDACTED] 2016	[REDACTED]	[REDACTED]	58%
[REDACTED]	[REDACTED] 2016	[REDACTED]	[REDACTED]	69%
[REDACTED]	[REDACTED] 2017	[REDACTED]	[REDACTED]	85%
[REDACTED]	[REDACTED] 2017	[REDACTED]	[REDACTED]	71%
[REDACTED]	[REDACTED] 2016	[REDACTED]	[REDACTED]	35%
[REDACTED]				
[REDACTED]	[REDACTED] 2017	[REDACTED]	[REDACTED]	77%

[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	88%
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	89%
[REDACTED]				

170. Since April 2016 8 forces/units have run an UCF Selection process; two of the processes being a collaborative process ((force/unit)) ((force/unit)) and one force/unit running two process ((force/unit))

**13. As requested at part 9 of the fifth rule 9 request, please provide an example of the type of record(s) kept by the College of selection activity across the regions.**

171. The College of Policing manages the Advanced and Online selection activity therefore we keep records of the units who wish to engage in the process, administrative arrangements, and contact details etc. We also keep records of candidates who are interested in attending the open day and the results of the sift and assessment centres. This includes candidates' results for all parts of the process. We also keep records of any costs and charges incurred by the College and passed to the unit.

172. The College of Policing does not manage the Foundation selection process activity in Units as they manage this themselves. However units are required to inform the College of their intention to run a Foundation process in order to book in a member of the team to come and do training and QA for each of the two stages and an occupational psychologist/s to deliver the

personality assessment. The College therefore keep records of when units intend to run a process, at what stage they are and when we are required to attend.

173. Units also send the results of each of the two stages of the assessment process only to the College – the College does not collect data on those attending the open day or sifting outcomes. These records are kept for each process that is run and stored [at location]. An example of the results data kept by the College was supplied as LM/36. Examples of the types of spreadsheets kept are shown in **Exhibit LM/48** 'Examples of records of selection activity across the regions'.

***14. Please provide copies of the documentation for the exercises used in the UCA selection process, any documents setting out what the candidate must demonstrate and the assessor guidance documents, which you state at paragraphs 79 and 91 are set at a different level to the UCF exercises.***

174. The documentation is supplied at **Exhibit LM/49 to LM/69**:

- **LM/49** 01 UCA interview assessor pack 2017 v1.2
- **LM/50** 02 UCA Interview - Record of Marks and question recording sheet
- **LM/51** 03 UCA Interview ORCE Sheet
- **LM/52** 04 Interview Summary Sheet
- **LM/53** 05 Interview Question Recording Sheet
- **LM/54** 01 Role Play\_Assessor Pack v1.3

- **LM/55** 02 Role play invigilator instruction
- **LM/56** 03 Role play candidate instructions
- **LM/57** 04 Role play candidate materials
- **LM/58** 05 Role play Role Actor pack
- **LM/59** 06 Role Play Role Actors' Notes
- **LM/60** 07 Role Play - Record of Marks Sheet
- **LM/61** 08 Role Play Candidate Summary Sheet
- **LM/62** 09 Role Play ORCE Sheet
- **LM/63** 01 Risk Assessment Exercise - Assessor Pack v1.2
- **LM/64** 02 Risk Assessment Candidate instructions
- **LM/65** 03 Risk Assessment Candidate materials
- **LM/66** 04 Risk Assessment invigilator instructions
- **LM/67** 05 Risk Assessment - Record of Marks Sheet
- **LM/68** 06 Risk Assessment ORCE Sheet
- **LM/69** 07 Risk Assessment Summary Sheet

***15. Please provide a copy of the realistic job preview for the UCA selection process, referred to at paragraph 81.***

175. This is supplied as **Exhibit LM/70**.

***16. Please explain what, if any, steps are taken to avoid, or otherwise to identify and manage, any conflict of interest that might arise as a result of using 'subject matter experts' from units who have candidates applying (see paragraph 82).***

176. Units who support the UCA Assessment Centre by sending subject matter experts to assess are carefully managed in relation to the allocation of assessors to candidates. The College of Policing is responsible for all logistics associated with the running of the Assessment Centre including the timetable. Two of each exercise run in parallel throughout the course of an assessment day, enabling the careful allocation of assessors and candidates so as to avoid any conflicts of interest such as an assessor assessing a candidate from their own unit. At the beginning of the training session as outlined in paragraph 151 to 158 assessors are shown the list of candidates and ask to declare any potential conflicts of interest and any changes to the timetable can be made accordingly. In the unlikely event that an assessor unexpectedly is presented with a candidate who they know, the method of assessment utilised at the assessment centre is designed to ensure the objective assessment and reducing the chance of unconscious bias. Assessors work in pairs and all recording of evidence and scoring of candidates is done individually in line with the ORCE (Observe, Record, Classify, Evaluate) before final scores are compared and agreed, thus reducing any chance of any bias influencing the assessment of any candidate. The whole process is quality assured by College of Policing Occupational Psychologists who observe both the exercise and the scoring process in order to ensure the process is adhered to. Final scores for all the exercises for each candidate are reviewed and ratified by the whole assessing team at the end of the assessment centre which is facilitated by an Occupational Psychologist.

**17. Are the Occupational Psychologists who quality assure the UCA assessing (referred to at paragraph 82) and the approved practitioners who conduct the psychological assessments as part of the UCA selection process (referred to in paragraph 85) different to the list of professional practitioners which undercover units can access to ensure proper assessment of and support for undercover operatives (which has already been provided to the Inquiry under the second s.21 notice)? If different, please provide a list of all such assessors. (The Inquiry seeks this information in order to identify potential witnesses; if inclusion of the names in the consolidated witness statement would cause the statement to acquire a security classification that it would not otherwise attract, the Inquiry is content to receive some or all of this information in a separate document. If names are provided separately, please ensure that this is apparent on the face of the statement.)**

177. The Occupational Psychologists who quality assure UCA assessing/sifting are part of the team employed by the College Selection and Assessment unit. The approved practitioners who conduct psychological assessments for UCA selection (referred to at Para 85) are Clinical Psychologists, and this is the same group of people who provide ongoing psychological assessment for mental wellbeing support. For the avoidance of doubt, the Clinical Psychologists provide both ongoing assessment and support for UCs, AND psychological assessment for UCA selection, but they do not quality assure the UCA assessing/sifting, which is done by Occupational Psychologists from the College, nor do they conduct personality assessment for UCF selection – this is done by Occupational Psychologists who are either employed by or associates of the College. The names of the

psychologists in all groups were provided in the response to the Second S.21 notice however I will provide an updated version listing those who have been added since the first version was supplied and making clear which roles each person/group undertakes. The names are supplied separately as **Exhibit LM/43** 'CoP Psychologists v2'

**18. Please clarify paragraph 97: have you now been able to access the original records? If so, please provide updated information. If not, what was the nature of the previous analysis which produced the dates and numbers provided in that paragraph?**

178. The archived data have now been accessed and the figures are as follows:

- [month] 2015 - [ ] attended, [ ] were successful (57%)
- [month] 2016 - [62% decrease in attendance] [#] were successful (75%)
- [month] 2017 - [12.5% increase in attendance], [#] were successful (78%)

179. Please note the attendance figure has been amended from [ ] to [ ] for [month] 2015 process

**19. Further to the numbers provided for the [ ] 2015 and 2016 and 2017 [ ] UCA selection processes (see paragraph 97), were any of those officers (both those who were ultimately successful and those who were unsuccessful) deemed unsuitable as a result of the psychological assessment and if so, how many?**

180. There were no candidates who were deemed unsuitable following their psychological assessments. # candidates from 2015 process were identified as having 'some concerns', of these [one third were] successful at the assessment centre and the [remainder] did not score high enough on the selection exercises to pass the assessment centre.

181. In order for candidates to be successful given the psychologists concerns the assessors need to satisfy themselves that the concerns are either low level concerns that can be dealt with in training or subsequently, and/or that that there is sufficient counter-evidence from other parts of the assessment process, to convince them that the concerns are mitigated. Employing units should monitor the UC once in role.

***20. The figures provided at paragraph 97 demonstrate an improvement in the rate of success since 2015.***

***a. To what extent is this considered to be a statistically significant change?***

182. The success rates at the latter two assessments are comparable (75% and 78% success respectively). This does show a higher success rate than at the first assessment process but it is not appropriate to make an assessment of whether this is a statistically significant change as the numbers are very small and this could be misleading.

***b. Has there been any analysis of the reason(s) for such improvement? Please comment (to the extent you are able to) on the reasons(s) for such improvement.***

183. No such analysis has been undertaken and the numbers are too small to show whether this is a genuine trend of improvement or an artefact

***21. Please detail the development and improvement to the UCA selection process that has taken place to date, as referred to in paragraph 100.***

184. As outlined in my response to Part 10 of the request, a review of the UCA selection process was started in August 2016 with exercise specific updates being done in 2017. As part of the 2016 review we also worked with the training department to look at those candidates who had gone on to complete the training course in order to ensure that the exercises continue to be an accurate reflection of the requirements of the role. It is an opportunity to ensure key areas of feedback from the training course are also reflected in the selection process (e.g. ensuring the role play provides the correct level of challenge required for the role). Feedback was sought from assessors at the assessment centre who had carried out the role play exercises (role players and assessors). This was combined with feedback following a debrief of the selection process and training course that was held on 12th October 2016. As a result, changes were made to the role play to increase the level of 'challenge' for the candidate prior to the [month] 2017 Selection Process to ensure the exercise was not only refreshed to maintain confidentiality of the process but to also ensure it continued to reflect the requirements of the role.

185. Following the [month] 2017 Selection Process a debrief was again held with the training team to repeat this review process to debrief the selection

process and the training course and further developments were suggested as a result of candidate performance on the training course, which are currently being implemented (specifically in relation to dynamic decision making). Undercover Advanced Operatives were consulted during the development of the role play exercise. These materials are still in development as part of the exercise updates mentioned above.

186. We also continue to liaise with the clinical psychologists to ensure that the process is effective and efficient. Although we are in the middle of designing a QA process for this our continued involvement with this at a national level allows us to constantly look at the processes and develop them where needed. Therefore we have made amendments to the ongoing psychological report to simplify its contents to ensure confidentiality but encourage communication between the clinical psychologists, operatives and COM-UC. We are also doing continued work to review how the psychological assessment informs the interview questions and providing more support to clinical psychologists on writing the psychological reports for UCA and UCOLO selection. Also as part of the exercise refresh we are also developing a new set of interview questions and the length of the interview is also being reviewed based on the feedback provided.

187. We also review our national processes as a matter of course following each process by asking for feedback from candidates and assessors to ensure that they are working effectively and therefore are able to make improvements quickly based on feedback we have received.

**22. Are officers permitted to apply for UCF or UCA roles more than once if unsuccessful in the selection process? Is there a maximum limit to the number of applications? Please provide any statistics held by the College of Policing as to the number of repeat applicants and success rates (as per the recommendation 'stage 7' on p.11 of LM/42).**

188. Please note that recommended Stage 7 of **Exhibit LM/42** has not been fully implemented due to limitations in College facilities for secure storage. Initially negotiations were underway to transfer this data to the national UC database but this has been delayed. Nevertheless I am able to provide the following information.

189. For UCF the Application Form asks if the candidate has previously applied for the role. We don't record this data as the Application Form and sifting stage is not run nationally by the College and is unit led and completed.

190. In the UCF Candidate Overview document, Candidates are informed that there is no set number of times they can apply. However, the recruiting unit may choose to set their own limit, and they should ask the recruiting unit in the first instance.

191. For UCA, the College has not set a limit on number of applications. We are able to see that 3 candidates have so far reapplied. In 2016 one

candidate applied and failed the sift, then reapplied [month] 2017 and was successful at the assessment centre. One candidate applied in [month] 2015 and was unsuccessful and is due to attend the [month] 2017 process. In 2015 one other candidate failed then reapplied in [month] 2016 and was successful. To date therefore we have not observed the issue of numerous attempts by the same candidate.

***23. Please provide detail on the annual evaluation by the College of Policing of all providers of psychological assessment or mental wellbeing support, as referred to on p.26 of LM/39, including but not limited to:***

192. The exact process of annual evaluation is in development. This has been delayed due to resourcing constraints within the College but also to allow time for the new psychological assessment processes to embed. It has taken longer than expected to ensure all forces are now working to the new model. The evaluation framework is being developed and this will cover compliance with procedures as well as quality of the service provision. It is likely to involve questionnaire surveys and/or telephone interviews with providers, undercover officers and COM-UCs, and dip sampling of reports. The College has been working with providers and Com-UCs to ensure that the process is understood and that COM-UCs know what they should be doing and what the providers should be doing.

***c. How many such evaluations have taken place?***

193. None as yet

***d. What form did the evaluations take?***

194. None have taken place yet.

***e. Please provide a summary of the outcome of the evaluations.***

195. None have taken place yet.

***f. How were any issues resolved?***

196. No evaluations have been conducted yet.

***24. Is the College of Policing able to provide any data as to the numbers of undercover operatives in relation to whom, as a result of ongoing psychological assessment, the psychologist / psychiatrist has:***

***g. Deemed them to be not fit to be deployed or fit with some considerations;***

197. The College does not see the outcomes of the ongoing psychological assessment sessions and therefore does not collect or retain any records of them. The psychologists' reports go directly to the COM-UC who should retain their own records.

***h. Raised few / minor concerns or serious concerns;***

198. The College does not see the outcomes of the ongoing psychological assessment sessions and therefore does not collect or retain any records of

them. The psychologists' reports go directly to the COM-UC who should retain their own records

***i. Raised concerns regarding the ethics or legality of the UCO's activities (paragraph 112);***

199. The College does not see the outcomes of the ongoing psychological assessment sessions and therefore does not collect or retain any records of them. The psychologists' reports go directly to the COM-UC who should retain their own records.

***j. Recommended CBT or EMDR treatment and the UCO has attended such treatment;***

200. The College does not see the outcomes of the ongoing psychological assessment sessions and therefore does not collect or retain any records of them. The psychologists' reports go directly to the COM-UC who should retain their own records.

***k. Recommended CBT or EMDR treatment and the UCO has not attended such treatment.***

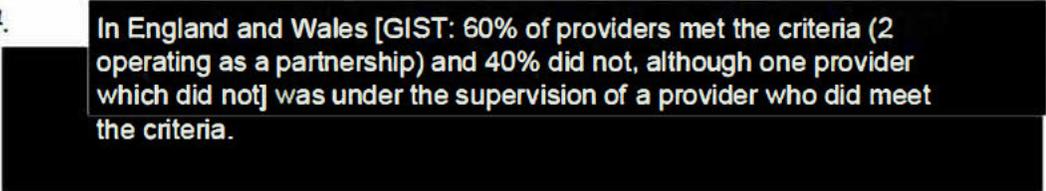
201. The College does not see the outcomes of the ongoing psychological assessment sessions and therefore does not collect or retain any records of them. The psychologists' reports go directly to the COM-UC who should retain their own records.

**25. Please provide a copy of the guidance for Cover Officers (referred to in paragraph 115).**

202. Two exhibits are supplied – the first is the original guidance written by the associate referred to in Para 115 of this statement and is exhibited as **Exhibit LM/71** 'Cover\_officer\_guidance (2)'.

203. The second is the Cover Officer Handbook which was based on the above and subsequently incorporated into the pre-course reading/workbook for Cover Officers. **Exhibit LM/72** 'COM UC Handbook on Mental Wellbeing Support and Psychological Assessment\_ V1.0 COCourse June 2014'. Please note the file title suggests COM-UC handbook but the document title is correct as Cover Officer Handbook.

**26. Further to paragraphs 122 and 123, how many psychological support providers did meet the new criteria?**

204.  In England and Wales [GIST: 60% of providers met the criteria (2 operating as a partnership) and 40% did not, although one provider which did not] was under the supervision of a provider who did meet the criteria.

205. Paragraph 123 above which states 'there were two providers that were no longer able to be used' should in fact state 'there were  providers that were no longer able to be used'.

**27. Please provide an update on the development of supporting materials and the quality assurance process referred to in paragraphs 124 and 125. Is the**

***process now underway? If not, when is it envisaged that the process will begin?***

206. Please see the response above at Paragraph 192.

***28. How have the issues with support provision identified for example at p.59 of the 2012 NPIA report been addressed?***

207. One of the significant issues with the way support provision was working was that it was viewed as a 'tick box exercise' i.e. something that had to be done but that was not being taken seriously. There was also a strong sense that mental wellbeing support was the domain of the professional provider. A huge amount of work has been done to embed the critical importance of taking personal responsibility for one's own mental wellbeing and fitness in the same way that undercover operatives are expected to take care of their physical fitness to work. This has been reiterated in the selection processes for UCF and UCA as part of the realistic job preview and the assessment process itself, and is included in the training from the handbook through to the course itself as part of dedicated sessions and assessment of the competencies throughout.

208. To address the identified 'stigma' of mental health problems or of talking about mental health, training has been provided to undercover officers at UCA and UCF, and to Cover Officers, stressing the importance of being able to address and manage mental health in a positive and appropriate way.

All UCs and Cover Officers also receive information about ways of enhancing resilience.

209. Evaluation has not yet taken place but it is anticipated that these changes have led to a shift in the culture in undercover policing towards a more positive and proactive attitude towards dealing with the psychological issues undercover officers may face.

210. The changes that have been made to the psychological support provision are aimed at providing reassurance to the COM-UCs responsible for undercover officers, and at identifying and dealing with potential problems or issues early before they become severe problems. Evaluation has yet to take place but it is anticipated that these changes will encourage more active engagement of COM-UCs with the mental wellbeing of their officers and a consistent approach to support provision will enable managers to have confidence that all officers are well supported by the psychological professionals.

211. It is not possible to force anyone to disclose psychological concerns but the changes taken as a whole make it more likely that mental health issues can be discussed and dealt with in a positive and proactive way, so that the individual is safeguarded as well as the operation or organisation concerned.

**29. You state in the final bullet point of paragraph 126 that the College does not run the selection processes for Cover Officers. Who does run such selection processes? Does the College play a role in standardising the processes across units or identifying minimum standards required for candidates?**

212. The College does not currently have any role in identifying minimum standards for Cover Officers or for standardising any assessment process for Cover Officers. To my knowledge there is no consistent standard selection process for Cover Officers, therefore it is my understanding that Cover Officers are recruited by each unit according to their own procedures.

**30. Following the observations regarding undercover online only operatives at p.14 of LM/35, has more work been done to assess the requirements for psychological input at the point of selection and for ongoing mental wellbeing support? If so, please provide details.**

213. Yes, further discussions were held with the clinical psychologists performing the assessments as well as operatives and managers. These informed a decision to set the frequency of ongoing psychological assessments to [#] monthly (as opposed to [half that frequency] for advanced officers). This practice was already in place in many of the units and agreed as working for both operatives and clinical psychologists with the further caveat that online operatives be given direct access to counselling if necessary without having to have a psychological assessment first. We also recommended that operatives (advanced and foundation) should also receive

a psychological assessment before going for training in online work to ensure they were prepared for the nature of the work. These requirements are outlined in **Exhibit LM/39** "Psychological Assessment and Mental Wellbeing Support for Undercover Operatives v13."

214. We have also worked with clinical psychologists to discuss the specific needs of online operatives and reviewed research in this area to provide specific training for online operatives on how to monitor their own wellbeing and issues to be aware of. Due to the relatively under researched nature of this specific type of work this is an area we are still gathering research, where available, and collecting feedback on in order to ensure the support and training meets their needs.

***31. Please provide an update on the progress made in developing changes to the undercover online selection, as set out in LM/35 and paragraph 131 of the witness statement. Particularly:***

***l. Has the selection process been designed and piloted? If not, what is the likely timescale for this work? If so, what was the outcome of the pilot and when will the process be implemented?***

215. The selection process has been designed, piloted and has been live for two processes and we are currently preparing to deliver a third process. A National Open Day was held on [date] 2017. The Assessment Centre will take place w/c [date] 2017.

***m. Please provide any documents or reports that have been produced.***

216. Associated documents have been produced as follows:

- LM/73 01 UCOLO Role play 1 v5
- LM/74 04 UCOLO interview pack v5
- LM/75 04 UCOLO Risk Assessment Exercise 1 v5
- LM/76 Application form sifting guidance UCOLO v2
- LM/77 Application form v3.0 July 2017
- LM/78 Candidate Overview Document 2017
- LM/79 Online Only Unit Overview Document advert, open day, RJP 2017 v1.0
- LM/80 Online Only Unit Overview Document open day onwards 2017
- LM/81 Realistic Job Preview 2017

217. Associated administrative documents are available if required (e.g. records of marks, invigilation instructions) and are similar to those already provided for UCF and UCA processes.

***n. Please confirm that officers who are successful in this selection process will be those officers who go on to take the A50 training course described at paragraphs 111 to 118 of Gary McFadden's witness statement dated 2 March 2017.***

218. Yes, those candidates who are successful in the UCOLO selection process go onto the A5O training course.

***Further to paragraphs 132 to 135, why did the College of Policing decide not to adopt a specific time period for tenure as suggested in the HMIC report?***

219. The HMIC report recognised the complexity and difficulty of setting a fixed tenure and recommended that the College establish and promulgate a policy. On attempting to define a fixed or specific time period it became clear that it was not possible to establish a fixed tenure that was workable in all cases. As examples the considerations include:

220. [REDACTED]

221. Level of exposure – this varies widely and setting a fixed term could be too short for some or too long for others depending on their level of exposure to psychological risk or exposure to criminal communities. Level of exposure, and other risks are to some extent independent of whether the operative is full/part time making fixed tenure for either group unhelpful.

222. It was therefore decided that a risk based approach would be more tailored to the individual circumstances of the UC and more likely to enable a balance between appropriate return on investment for the unit and avoidance of risk or harm for the operative or the unit.

***As requested at part 12(2) of the fifth rule 9 request, who is the “the National Workstream Lead of Selection” referred to in paragraph 49 of David Tucker’s witness statement dated 11 March 2016?***

223. As mentioned at Para 35 this was PN0005 of the MPS.

***Page 17 of LM/39 and paragraph 4.1.3 of the draft APP refer to regular psychological assessments of UCFs being at the direction of the COM-UC. To what extent (and if so, how) does the College of Policing monitor whether COM-UCs decide to implement regular psychological assessments for UCFs? Does the College have any information as to how often UCFs have psychological assessments in practice?***

224. No, the College does not specifically monitor whether COM-UCs implement regular psychological assessments for UCFs and we do not hold any information on how often this occurs. However, as part of the accreditation process a unit’s management of psychological wellbeing including formal systems for referral to psychologists and decision making around required frequency of psychological assessment in line with the APP will be assessed.

***Please provide a copy of the 'Cover Officer Handbook' referred to at page 18 of LM/39, if different to the guidance requested at part 25 of this request.***

225. This is the same documentation as that requested at part 25 and supplied as Exhibit LM/72.

***36. What provision is made for the mental wellbeing and welfare of former undercover officers (whether UCA, UCF or online only) after they have completed their tenure as an undercover officer, not only at the end of their final deployment, but also on an ongoing basis thereafter? Has the College of Policing undertaken any research or analysis in this regard? Does the College have any role in advising undercover units as to the appropriate approach or in standardising the approach between units? Has any guidance been produced regarding ongoing mental wellbeing after tenure, whether for the police forces, the former undercover officers, their subsequent managers and/or for the psychologists / psychiatrists? Is the same list of approved psychologists / psychiatrists (provided under the second s.21 notice) used for this purpose?***

226. The tenure guidance directs COM-UCs to consider what support the operative may continue to need on reintegration to regular policing or retiring directly from a UC role (e.g. Psychological/Social support). This is also covered in the training for Cover Officers where they are reminded that end of tenure/leaving the unit can be a difficult emotional transition and that they should consider the support that may need to continue to be provided until a successful transition has been made. A UC returning to mainstream duties or

retiring from UC work would have been subject to regular psychological assessment (or where necessary at discretion of the COM-UC for UCF) – it is likely that the psychologist would also make a recommendation as to whether ongoing support was needed.

227. APP talks about making proper arrangements for reintegration after completion of UC work. It is also specifically mentioned as part of the accreditation process.

228. The College does not undertake any research or analysis of this however, and no specific separate guidance has been produced on providing support for those who have ended their tenure as a UC. If psychological support was to continue to be provided after tenure it is probable that this would continue to be provided by the same psychologist providing support to active operatives in the unit but this would be the responsibility of the unit to arrange and manage.

***37. Is the College of Policing involved in the selection of officers for the A4, A5, A6, A7, A8 or A9 courses described in paragraphs 98 to 110 and 119 to 145 of Gary McFadden’s witness statement dated 2 March 2017? If so, please provide detail equivalent to that which has already been provided in relation to the selection of UCF and UCA officers for the A1 and A2 courses. If not, who does run the selection processes for these courses and does the College play a role in standardising the processes across units or identifying minimum standards required for candidates?***

229. The A4, A5, A6, A7, A8 and A9 courses are modules for which UCF or UCA training is a prerequisite. All operatives who are either UCF or UCA have been through rigorous assessment and training and there are no further assessments.

230. The exception to this is whereby operatives attending a UC Online module must first have a psychological assessment with a clinical psychologist to determine their psychological suitability and readiness, because UC Online work is regarded as having similar levels of psychological risk as an advanced undercover operative.

I believe that facts stated above in this statement are true.

Dated the 8<sup>th</sup> day of September 2017

Signed.....  


231. I shall now respond to the questions and clarifications posed in the supplementary Rule 9(5B) request dated 25th September 2017:

- 1. We understood from paragraph 39 that the UCF selection process was rolled out from November 2014, however your answer to point 12 of rule***

***9(5)(A) refers to processes run since April 2016 only. Please explain why this is the case and, if processes were run before April 2016, please provide the dates, number of applicants and number of successful officers for those assessment processes.***

232. The 2015 processes were omitted in error because they were considered 'pilots'. However, in actual fact they were 'live pilots' selecting real candidates and so they have been included in the below table at paragraph 233. The process was being developed during the live pilots so there are some differences between these processes and the live assessments from 2016 (e.g. the initial role-play exercise had a written statement exercise afterwards, which was subsequently changed to a Cover Officer debrief on the basis of pilot feedback and analysis).

233. In checking the data from 2015 it has become apparent that other errors have been made in the data provided in my second, Rule 9(5A), statement (paragraph 169). This was because in some of the new two-stage processes candidates who had been unsuccessful at stage one (roleplay) were omitted from the total (sifted) figure in error. There were also a small number of miscalculations and errors made where candidates who had withdrawn were incorrectly accounted for. These have been rectified in the below table and checked, and processes have been put in place to ensure that future data can be accessed and analysed more easily to enable accuracy. Action has also been taken to re-emphasise the responsibility of units to provide all selection data from sift, stage 1 and stage 2 (including withdrawals) to ensure the College has a full dataset.

Unit/Date	Total (sifted)	Successful (Recommended)	Success rate %
██████████ 2016	████	████	58%
██████████ 2016	████	████	69%
██████████ 2017	████	████	55%
██████████ 2017	████	████	63%
██████████ (pilot of 2 stage process) 2016	████	████	35%
██████████ (in conjunction with ██████████ 2015)	████	████	38%
██████████	████	████	████
██████████ (pilot of 2 stage process) 2017	████	████	44%
██████████ 2015	████	████	50%
██████████ 2017	████	████	37%

[redacted] [redacted] [redacted] [redacted] [redacted] [redacted]	[redacted] 2017	[redacted]	[redacted]	80%
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted] (in conjunction with [redacted] 2015) [redacted]	2015	[redacted]	[redacted]	50%
[redacted] [redacted] [redacted] [redacted]	[redacted] 2017	[redacted]	[redacted]	40%

234. Amendments and clarifications:

- [force/unit] have only held one assessment process (in [redacted] 2017), the other references to [force/unit] or [redacted] in the original statement should have referred to [force/unit] .
- This data does not include candidates who withdrew from the process having not being exposed to the assessment process (i.e. before the first stage).
- The 2015 assessment processes ([force/unit] and [2 forces/units] ) were treated as pilots although they did select real candidates. Updates were made after both separate 2015 processes, which then led to the official live

assessment process, sanctioned by the NUWG, all remaining data in the table refers to the live assessment processes.

**2. Further to para 178, please provide the dates, number of officers attending, number of officers who were successful and percentage success rates for all UCA selection processes run to date (including the courses held in October 2016 and [month] 2017 referred to in paragraph 184).**

235. Where reference was made in paragraph 184 to 'a debrief of the selection process and training course that was held on 12th October 2016' this refers to the debrief meeting that was held on 12th October 2016. There was no UCA selection in October 2016.

236. Where reference is made to the [month] 2017 Selection Process, this indicates the start date of the whole process including advert issued by Units for expressions of interest and the National UCA Selection Process Open Day. The Assessment Centre for that process has only just concluded on [redacted] 2017. The results for this process are as follows:  
[redacted] [month] 2017 - [55% increase in attendance on previous assessment] (43% successful).

237. However the reference in Paragraph 185 to a debrief that happened after the [month] 2017 process was potentially misleading – the debrief did happen after the start of the selection process (which began in [month] 2017 and concluded in [month] 2017), but it was a debrief of the [month] 2017

assessment centre. The reason for the delay in conducting the debrief was that the team (College psychologists engaged in the design and delivery) needed to wait until after the training course so that they could debrief the assessment centre in the context of training outcomes. The outcomes of the debrief fed into changes to the materials for the [month] 2017 assessment centre.

238. To clarify, there was no assessment centre in May 2017. The selection process started in [month] 2017 and concluded with the assessment centre in [month] 2017.

**3. Please confirm that exhibits LM/49 - LM/69 are the updated versions of the documents produced following the feedback and review in October 2016 and [month] 2017 (described in paragraph 184).**

239. The documents supplied (**Exhibits 49-69**) were the latest at the time of writing the statement. Some of these had been updated since the [month] 2017 Assessment Centre, albeit some are only minor changes such as the dates. The changes that were made to the exercise material as a result of the [month] 2017 debrief had not been included in the exercise materials supplied to the Inquiry. Changes made to the supplied exhibits for the [later] assessment centre include increased challenge in the roleplay to test candidates further, and an updated scenario for the risk assessment exercise and some changes to the interview questions. Initial feedback and results were positive but this is kept under continuous review.

**4. Was the individual who unsuccessfully applied for UCA selection in [REDACTED] 2015, successful in the [REDACTED] 2017 process (see paragraph 191)?**

240. Yes, the candidate who was unsuccessful at the [REDACTED] 2015 selection process was successful in the [REDACTED] 2017 process.

**5. Is the College of Policing able to offer an assessment as to why the two candidates referred to in paragraph 191 (or three candidates, depending on the response to point 4 above) were successful on their second application to the UCA selection process? To what extent did the College of Policing seek to ensure that the issues which caused them to fail previously were specifically addressed as part of the selection process?**

241. Applicants for the UCA selection process have usually been working as a UCF and have been identified and supported by their units as being suitable for selection. All candidates' applications are subject to the national sift process and/or a thorough in-force sign off which is quality assured by College psychologists. Only if candidates are successful at this stage will they go through to the selection process. It is likely therefore that all candidates attending the selection process have significant skills and experience which will contribute to their future effectiveness as a UCA.

242. On completion of the selection process the candidates and the units receive feedback which is intended to support the candidate's development. It is likely

therefore that most candidates will work on their identified development needs and they will be supported in this by the unit, as the unit regards them as a valuable asset.

243. Each selection process is an objective process in its own right, therefore each candidate is assessed against the criteria without reference to previous performance or identified development needs or concerns, other than those identified by the psychologist which are highlighted in the psychologist's report and explored in the interview.

244. Only those candidates who meet the criteria (including passing the roleplay) will be successful therefore if candidates are successful on their second attempt this is because they have improved their performance sufficiently to meet the standard.

245. It is to be expected that candidates will improve performance following feedback and further development.

**6. Further to paragraphs 207 - 211, please explain how the College of Policing has addressed the following issues regarding the support provision also raised in the 2012 NPIA report (at page 60):**

**a. the operation of client confidentiality and whether there is sufficient dialogue with the Heads of Unit for example; and**

246. Through the development of the psychological assessment and mental wellbeing processes the College of Policing has outlined expectations from both units and providers.
247. It is important for there to be trust between the psychological service provider and the UC, and client confidentiality is an important part of this, as well as being a professional requirement of the provider. At the same time there is a need for Heads of Unit to be aware of any concerns that the psychologist has.
248. The process put in place is that Heads of Unit/COM-UCs would receive a report from the provider that outlined the outcome of operatives' regular assessments in relation to being "fit to deploy", "fit to deploy with some considerations" and "not fit to deploy".
249. Where necessary (if concerns are identified) the operative is then required to discuss their needs for psychological/wellbeing support with the Head of Unit/COM-UC (by a specific date). The provider will then have a conversation with the Head of Unit/COM-UC to discuss appropriate measures for the COM-UC to take. It is not necessary for the provider to discuss the details of the operative's issue or any personal or sensitive details discussed. If the psychologist does think it is important for details to be discussed, this will only be done with the permission of the operative, except in the most serious cases where confidentiality may be broken if the life of the operative or someone else is at risk.

250. This provides a clear and transparent process where everyone understands the boundaries and limitations of the relationship, allowing trust and confidentiality in the client relationship whilst still ensuring that any issues are highlighted and therefore risks reduced.

***b. The perceived lack of knowledge about the work of undercover officers.***

251. The Psychological Assessment and Mental Wellbeing Support providers are required to attend a workshop which covers the details and characteristics of the different types of roles within UC policing and the associated risks and stressors. The workshop covers the roles of providers, operatives and managers and covers the requirements of Approved Professional Practice. The PowerPoint slides associated with the workshop are exhibited as **Exhibit LM/82**.

252. Practical considerations such as security, and report writing are discussed, as is the importance of ongoing supervision and professional practice issues for providers.

253. It is the intention that the College will facilitate the ongoing development of providers by arranging workshops at which the psychologists can share information, case study examples and best practice with each other, in order to facilitate their increased skill and knowledge. This is in the planning phase at present and is likely to start in Spring/Summer 2018 but dates are not yet in place.

**7. Further to paragraphs 229 and 230, who does decide which officers attend the A4, A5, A6, A7, A8 and A9 courses? Is there any selection at all e.g. any assessment by the units of the officers' suitability based on their current performance, or do officers simply volunteer to attend?**

254. For a number of the modules there are pre-requisites such as A1 or A2 training, so these are only available to those who already operate as undercover operatives. The A7 and A8 courses should be completed by all those in relevant roles. Selection for suitability to attend the optional modules is a matter for units who will need to authorise and fund the training, however the College is not involved in this process except to confirm the required prerequisites have been met.

I believe that facts stated above in this statement are true.

Dated the 20<sup>th</sup> day of October 2017

[signature]

Signed.....